

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION

FILED
04 MAR 23 PM 2:25
U.S. DISTRICT COURT
N.D. OF ALABAMA

JERRY BODIE,

Plaintiff,

v.

THE PURDUE PHARMA COMPANY,
PURDUE PHARMA L.P.,
PURDUE PHARMA INC.,
PURDUE FREDERICK COMPANY,
THE P.F. LABORATORIES, INC.
ABBOTT LABORATORIES,
ABBOTT LABORATORIES, INC.,

Defendants.


CIVIL ACTION NUMBER:

CV-02-C-2838-W

PLAINTIFF'S OBJECTION TO
THE CONTINUATION OF THE DEPOSITION OF
NON-PARTY WITNESS, KAREN WHITE

COMES NOW the Plaintiff in the above-styled matter, JERRY BODIE (hereinafter referred to as "Plaintiff"), by and through his undersigned counsel of record, and pursuant to Rule 30(d)(2) of the Federal Rules of Civil Procedure, hereby submits the following Objection to the attempt by Defendants, Purdue Pharma, L.P., Purdue Pharma, Inc., The Purdue Pharma Company, and The Purdue Frederick Co. (hereinafter collectively referred to as the "Purdue Defendants"), to continue the deposition of non-party witness, Karen White. As grounds therefore, the Plaintiff adopts and incorporates as if fully set forth herein Karen White's recently filed Motion to Quash the Amended Cross-Notice of the Continuation of her deposition, including all factual and legal submissions presented therein.

26

A handwritten signature in black ink, appearing to read 'P. W. McCallum', is written over a horizontal line.

PHILLIP W. MCCALLUM

JAMES M. TERRELL

Attorneys for Plaintiff

OF COUNSEL:

MCCALLUM & METHVIN, P.C.

2201 Arlington Avenue South

Birmingham, Alabama 35205

(205) 939-0199

Charles A. McCallum, III

R. Brent Irby

MCCALLUM LAW FIRM

2062 Columbiana Road

Birmingham, Alabama 35216

(205) 824-7767


CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing by placing a copy of the same in the United States Mail, first-class postage prepaid and addressed to their regular mailing address, on the 13 day of March 2004, to the following:

Harlan I. Prater, IV, Esq.
Melody L. Hurdle, Esq.
Lightfoot, Franklin & White, LLC
The Clark Building
400 20th Street North
Birmingham, Alabama 35203

Lee E. Bains, Esq.
Lorrie L. Hargrove, Esq.
Maynard, Cooper & Gale, P.C.
1901 Sixth Avenue North
2400 AmSouth/Harbert Plaza
Birmingham, Alabama 35203

Champ Lyons
2201 Arlington Avenue S.
Birmingham, AL 35205
(205) 933-5112 telephone
(205) 933-5114 facsimile


OF COUNSEL